

REMARKS

In the Office Action, claims 1-20 were rejected and the election of the species of claims 1-20 was made final. All pending and examined claims are believed to be clearly allowable. Reconsideration and allowance of all pending claims are requested.

Rejections under 35 U.S.C. § 102

Independent claims 1, 12 and 13 were rejected under 35 U.S.C. § 102(b) as being anticipated by Emery (U.S. Patent 6,624,547). Anticipation requires the disclosure in a single prior art reference of each element of the claim under consideration. Applicants respectfully assert that the present invention, as recited in independent claims 1, 12 and 13, is patentable over Emery.

Claim 1 and claims depending therefrom:

Claim 1 is clearly distinguishable from the teachings of Emery. In particular, Emery does not teach, disclose or suggest at least “a series of serially connected turns formed by litz wire having a plurality of strands”, as recited in claim 1. Litz wire, as disclosed herein by the Applicants, has a specific purpose, construction, and performance. This is evident from the hyperlinks below:

<http://www.w8ji.com/skindepth.htm>

<http://www.mwswire.com/litzmain.htm>

However, Emery does not disclose the use of litz wire for increasing the surface area for current conduction, by what is known as the ‘skin effect’. Moreover, the separate conductors taught by Emery simply cannot function as the claimed litz wire arrangements would. Emery provides no suggestion whatsoever for the use of litz wire. Applicants submit that the insulating and packaging techniques of Emery simply cannot be employed with litz wire.

This distinction between the arrangement recited in claim 1 and the Emery arrangement cannot be ignored. For at least this reason, the present invention, as recited in independent claim 1 is not anticipated by Emery. Thus, it is respectfully requested that the rejection of claim 1 under 35 U.S.C. §102(b) be withdrawn.

Claim 12 and claims depending therefrom:

Claim 12 was similarly rejected under 35 U.S.C. § 102(b) as being anticipated by Emery. Applicants respectfully assert that the present invention, as recited in independent claim 12, is patentable over Emery. In particular, as mentioned above, Emery does not teach, disclose or suggest at least the claimed “a series of serially connected turns formed by litz wire having a plurality of strands”. This distinction, here again, cannot be ignored.

Therefore, for at least this reason the present invention, as recited in independent claim 12 is not anticipated by Emery. Thus, it is respectfully requested that the rejection of Claim 12 under 35 U.S.C. §102(b) be withdrawn.

Claim 13 and claims depending therefrom:

Claim 13 was rejected under 35 U.S.C. § 102(b) as being anticipated by Emery. Applicants respectfully assert that the present invention, as recited in independent claim 13, is patentable over Emery. In particular, Emery does not teach, disclose or suggest at least the claimed “a series of serially connected turns including at least one conductor”. Emery does not disclose *serially connected turns*, as that term would be understood by one skilled in the art. Turns in a coil in an electrical machine refer to conductive wires or other conductors carrying current that are wrapped in loops (i.e., in multiple turns). The conductors in Emery are not serial, but are parallel. No suggestion of serial connection can be found in the reference.

Therefore, the present invention, as recited in independent claim 13 is not anticipated by Emery. Thus, it is respectfully requested that the rejection of Claim 13 under 35 U.S.C. §102(b) be withdrawn.

Certain of the claims depending from claim 13 are commented on here to further demonstrate their patentability. For example, claim 14 recites “a floating voltage potential”. The Emery reference is completely silent on this point. No reference whatsoever to *a floating voltage* or *a floating potential*, or any analogous characteristic can be found in the Emery reference. Therefore, the Emery reference cannot possibly support a rejection under 35 U.S.C. §102(b) for claim 14.

Claim 15 recites “the floating voltage potential is within the range of a turn-to-turn voltage of the series of turns”. Here again, no reference whatsoever to floating voltage potential being within *the range of a turn-to-turn voltage* can be found in the Emery reference. Therefore, the Emery reference cannot possibly support a rejection under 35 U.S.C. §102(b) for claim 15.

Claim 16 recites “the at least one cooling tube is electrically insulated with a film insulation”. On the contrary, in the Emery reference, the insulation around the cooling tubes 30 is a tape. One skilled in the art would not understand this to mean a film insulation. Therefore, the Emery reference cannot possibly anticipate claim 16 under 35 U.S.C. §102(b).

Claim 17 recites “the at least one cooling tube is coated with a thermally activated adhesive”. As above, Emery no reference whatsoever to the cooling tube being coated with *a thermally activated adhesive*. Therefore, the Emery reference cannot possibly support a rejection under 35 U.S.C. §102(b) for claim 17.

Claim 18 recites "at least one film insulator". On the contrary, in the Emery reference, the insulation around the cooling tubes 30 is a tape, as mentioned above. One skilled in the art would not understand this to mean film insulator. Therefore, the Emery reference cannot possibly anticipate claim 18 under 35 U.S.C. §102(b).

Conclusion

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

Date: 4/13/2005

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